

# EXHIBIT G

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
CIVIL ACTION NUMBER: 04-11924-RGS

IAN J. BROWN, JAMES BROWN,  
and BARBARA BROWN,

Plaintiff,

VS

UNITED STATES OF AMERICA,  
VERIZON NEW ENGLAND, INC.,  
and BOSTON EDISON COMPANY  
d/b/a NSTAR ELECTRIC,

Defendant.

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**DEPOSITION OF**

**PETER D. DION**

October 17, 2005  
12:00 p.m.

Manheimer & Charnas, LLP  
210 Commercial Street  
Boston, Massachusetts

Lauren Sullivan, Notary Public and Professional  
Shorthand Reporter within and for  
the Commonwealth of Massachusetts



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1 I'm assuming that it's --

2 Q. I think it says Bedford there.

3 A. -- Bedford there, yes.

4 Q. So is that fair to say...

5 A. Yes.

6 Q. Okay. Now, looking at the column  
7 across from 16-37.

8 A. Um-hum.

9 Q. Where it meets the top column,  
10 which says, "Date and place;" do you see  
11 that? There are three numbers; 29, 54,  
12 and 64.

13 A. Yes.

14 Q. And I take it that reference is the  
15 fact that pole 16-37 was replaced in 1929,  
16 1954, and 1964.

17 A. I believe so, yes.

18 Q. And looking at the column just to  
19 the left of that box we just referenced,  
20 there's a 16 and that's under the column  
21 date set.

22 Is it fair to say that that  
23 reference is the fact that pole 16-37 was  
24 initially set in 1916?



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1 A. I believe that's the case.

2 Q. Now, in the column to the left of  
3 what we've just been talking about. There  
4 is a column, "Location diagram poles;" do  
5 you see that?

6 A. Yes.

7 Q. Now, generally speaking, what is  
8 that? What are those references?

9 A. I believe it's an attempt to draw  
10 away this pole that's relative to the  
11 landscape out there at the time.

12 Q. You see at the top, there's a  
13 horizontal line with a B on the left and  
14 a B on the right, at the top.

15 A. Yeah.

16 Q. What is that reference; do you  
17 know?

18 A. I do not know.

19 Q. And then a little bit further down,  
20 there is a circle and it says TV; do you  
21 know what that references?

22 A. I believe it means that cable TV  
23 was added to that pole at some point.

24 Q. And look to the right of that first



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